

**STATE OF SOUTH CAROLINA****(Caption of Case)****South Carolina Electric & Gas Company - Annual  
Review of Base Rates for Fuel Costs****BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA****COVER SHEET****DOCKET****NUMBER: 2008 - 2 - E**

(Please type or print)

**Submitted by:** **E. Wade Mullins, III****SC Bar Number:** **3525****Address:** **P.O Box 61110  
Columbia, SC 29260****Telephone:** **803-252-7693****Fax:** **803-254-5719****Other:****Email:** **wmullins@bprwm.com**

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

**DOCKETING INFORMATION** (Check all that apply)

- ☐ **Emergency Relief demanded in petition**      ☐ **Request for item to be placed on Commission's Agenda expeditiously**
- ☐ **Other:**

<b>INDUSTRY (Check one)</b>	<b>NATURE OF ACTION (Check all that apply)</b>		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

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INTERVENOR  
#2 3/27/08 1030  
BRUNER, POWELL, ROBBINS, WALL & MULLINS, LLC

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JOEY R. FLOYD, P.A.

OF COUNSEL:  
WILLIAM D. BRITT, JR.

AUTHOR'S E-MAIL: [WMULLINS@bprwm.com](mailto:WMULLINS@bprwm.com)

February 6, 2008

**VIA HAND DELIVERY**

The Honorable Charles L.A. Terreni  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

RECEIVED  
2008 FEB -7 PM 4:02  
SC PUBLIC SERVICE  
COMMISSION

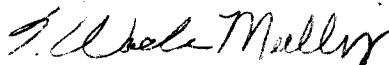
RE: Annual Review of Base Rates for Fuel Costs of South Carolina Electric  
and Gas Company  
**Docket No. 2008-2-E**  
Petition to Intervene of CMC Steel South Carolina

Dear Mr. Terreni:

Enclosed for filing please find the original and ten (10) copies of the Petition to Intervene of CMC Steel South Carolina in the above-referenced matter. I have also enclosed an extra copy of the petition and would appreciate you file stamping the extra copy and returning it to me via courier. By copy of this letter, I am serving all parties of record. If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,



E. Wade Mullins, III

Enclosures

cc: Scott Elliott, Esquire (w/enc.)  
Nanette S. Edwards, Esquire (w/enc.)  
Shannon B. Hudson, Esquire (w/enc.)  
K. Chad Burgess, Esquire (w/enc.)  
Catherine D. Taylor, Esquire (w/enc.)  
Mitchell Willoughby, Esquire (w/enc.)  
Damon E. Xenopoulos, Esquire

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OK Duke  
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**BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**In RE:**

**Annual Review of Base Rates for Fuel  
Costs of South Carolina Electric and Gas  
Company**

**Docket No. 2008-2-1**

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**COMMISSION**

**PETITION TO INTERVENE OF CMC STEEL SOUTH CAROLINA**

CMC Steel South Carolina ("CMC") hereby petitions to intervene in the above-captioned proceeding. CMC states the following grounds in support of its petition.

1) CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This facility utilizes an electric arc furnace ("EAF") to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from South Carolina Electric & Gas Company ("SCE&G") at a cost of millions of dollars a year. Because the cost of electricity is one of the major costs of steel-making utilizing an EAF, the cost of electric power directly affects CMC's ability to produce steel at a competitive price. CMC is one of the largest retail customers of SCE&G.

2) Due to the magnitude and unique characteristics of its load, CMC cannot be represented adequately by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.

3) CMC's mailing address is:


CMC Steel South Carolina  
310 New State Road  
Cayce, SC 29033

4) CMC is represented by the Washington, D.C. law firm of Brickfield, Burchette, Ritts & Stone, P.C. in various matters regarding electric rates and service. In the past few years,

attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804 S.(1)(b) of the Commission's Rules of Practice and Procedure, Brickfield, Burchette, Ritts & Stone, P.C. will associate with E. Wade Mullins, III, Esq. and Joey R. Floyd, Esq. of Bruner, Powell, Robbins, Wall & Mullins, LLC, local counsel licensed to practice in South Carolina. An appropriate Motion for Admission Pro Hac Vice will be filed with the Commission. Service and correspondence regarding this proceeding should be sent to all of the undersigned.

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted,



E. Wade Mullins, III, Esq.

Joey R. Floyd, Esq.

Bruner, Powell, Robbins, Wall & Mullins, LLC

P.O. Box 61110

Columbia, South Carolina 29260

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Damon E. Xenopoulos, Esq.

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1025 Thomas Jefferson Street, N.W.

Eighth Floor -- West Tower

Washington, D.C. 20007

(202) 342-0800

*Attorneys for CMC Steel South Carolina*

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**Docket No. 2008-2-E**

**RECEIVED**  
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**SC PUBLIC SERVICE**  
**COMMISSION**

**IN RE:**

**Annual Review of Base Rates for Fuel  
Costs of South Carolina Electric and  
Gas Company**

**CERTIFICATE OF SERVICE**

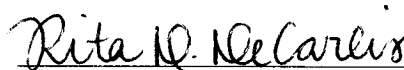
This is to certify that I have caused to be served this day ten (10) copies of the **Petition to Intervene of CMC Steel South Carolina** via hand delivery to the persons named below at the addresses set forth below:

Scott Elliott, Esquire  
Elliott & Elliott, P.A.  
721 Olive Street  
Columbia, SC 29205

Nanette S. Edwards, Esquire  
Shannon Bowyer Hudson, Esquire  
Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, SC 29201

K. Chad Burgess, Esquire  
Catherine D. Taylor, Esquire  
South Carolina Electric & Gas Company  
1426 Main Street, M/C 130  
Columbia, SC 29201

Mitchell Willoughby, Esquire  
Willoughby & Hoefer, P.A.  
930 Richland Street  
Columbia, SC 29201



Rita D. DeCarlis  
Legal Assistant to E. Wade Mullins, III

Columbia, South Carolina  
This 7<sup>th</sup> day of February 2008